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CUSTOMER NO. 23494

**OCT 13 2006**

Attorney Docket No. P104-US

REMARKSREJECTION OF CLAIM 1

Independent claim 1 was rejected under 103(a) over Doherty (2003/0227677) taken with Doherty (6,201,521) in view of Pettitt (6,774,916). This rejection is respectfully traversed.

As a background, the present invention is directed to methods and apparatus for transposing pixel-by-pixel data into bitplane data that are used for digital display systems.

Claim 1 expressly recites, among other features, the steps of loading a pixel data matrix of the image; delivering the rows of the matrix in parallel into a data converter; transposing, by the data converter, the pixel data matrix into a bitplane matrix following a bitplane format wherein matrix elements in one row of the matrix represent one pixel of the image; and sending the bitplane matrix into the memory cell array for actuating the micromirrors such that the image is produced by the micromirrors (emphasis added).

In contrast, the Doherty ('677) reference is directed to a method for compensating lamp variations and phase locking of free free-running sequencer. The Doherty ('677) reference does NOT teach or suggest data conversion from pixel-by-pixel data to bitplane data.

The Doherty ('521) reference is directed to a method of addressing pixels of a spatial light modulator used in digital display systems. Specifically, as expressly illustrated in FIG. 3 to FIG. 6, the pixel array of the spatial light modulator is divided into sub-sets, each of which is provided with a reset-line (e.g. reset line 34 in FIG. 3). In accordance with the sub-set configuration of the pixel array, Doherty ('521) discloses a method for delivering bitplane data to the individual pixels in the sub-sets. Doherty ('521) does not teach or suggest a method of preparing bitplane data from pixel-by-pixel data, much less teaching or suggesting the method of claim 1 in this patent application.

The Pettitt reference does not remedy the deficiencies of the Doherty references ('677 and '521). Pettitt is directed to a dithering method for mitigating contour in digital display systems. Pettitt does not teach or suggest a method for transposing pixel-by-pixel data into bitplane data.

Because the Doherty references ('677 and '521) and Pettitt reference, either individually or in any combination thereof, fail in teaching or suggesting all features of claim 1, claim 1, as well as claims 2-14 that depend from claim 1, is patentable over the Doherty references and Pettitt. Reconsideration and withdrawal of the rejection are respectfully requested.

Examiner's rejection bases

In the Office Action, the Examiner explained the rejection bases as: "It would have been obvious to a person of ordinary skill in the art at the time of the invention to provide to the device as taught by Doherty et al ('677) taken with Doherty ('521) the feature as taught by Pettitt et al. in order to put the

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Doherty et al ('677) taken with Doherty ('521) the feature as taught by Pettitt et al. in order to put the bitplane data into the memory cells which in turn will be reflected in the micromirrors." The Examiner further explained in the "response to applicant's remarks" section that "Doherty, (col. 3, lines 45-65) teaches display memory receives processed pixel data from processor system. It forms the data, on input into "bitplane" format and delivers the bitplanes to SLM one at a time. It would be obvious to a person of ordinary skill in the art at the time of the invention that to make the conversion of pixel matrix to bitplane requires a converter (col. 3, lines 54-56); said converter would have to receive the pixel row data in parallel if said format was required to generate the said bit-plane."

It is respectfully submitted that the above Official Notice and reliance on "Common Knowledge in the Art" that *"It would be obvious to a person of ordinary skill in the art at the time of the invention that to make the conversion of pixel matrix to bitplane requires a converter (col. 3, lines 54-56); said converter would have to receive the pixel row data in parallel if said format was required to generate the said bit-plane."* are improper for at least the following reasons. First, there is no *prima facie* of obviousness established based on Doherty ('677 and '521) and Pettitt ('916) references. Second case, the Examiner did not identify any documentary evidence in supporting the Official Notice. In particular, the Examiner did not provide any documentary evidence on the feature of *"in parallel"* in the scope of the invention in claim 1. The Examiner is respectfully requested to provide documentary evidence in support of his Official Notice statements.

It is believed that this application is in condition for allowance. Favorable consideration and prompt allowance are respectfully requested. In the event any fees are required in connection with this paper, please charge our Deposit Account No. 20-0668.

Respectfully submitted,

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